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*VirtaMove Corp.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

RED HAT INC.,

Plaintiff,

v.

VIRTAMOVE CORP.,

Defendant.

Case No. 5:24-cv-04740-PCP

**DECLARATION OF AMY E. HAYDEN IN  
SUPPORT OF DEFENDANT  
VIRTAMOVE'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
PORTIONS OF ITS PROPOSED SUR-  
REPLY**

1 I, Amy E. Hayden, declare as follows:

2 1. I am counsel for VirtaMove Corp. in the above-captioned action. I provide this  
3 declaration in support of VirtaMove's Administrative Motion to File Under Seal Portions of its  
4 Proposed Sur-Reply to Red Hat's Reply in Support of its Motion for Jurisdictional Discovery. I  
5 have personal knowledge of the facts set forth herein, and if called upon to testify, could and would  
6 testify competently thereto.

7 2. I have reviewed the contract between VirtaMove and the company referenced in  
8 VirtaMove's sur-reply and Exhibit D to the sur-reply. This contract has a confidentiality provision  
9 that requires that both VirtaMove and that company keep the terms and conditions of the contract  
10 confidential.

11 3. Exhibit A filed in support of VirtaMove's administrative motion for leave to file  
12 the proposed sur-reply is a true and correct copy of VirtaMove's proposed sur-reply.

13 4. Exhibit D filed in support of the proposed sur-reply is a true and correct copy of  
14 excerpts from the deposition of Susan Cameron, dated October 10, 2024, from *VirtaMove Corp.*  
15 *v. Amazon.com, Inc. et al.*, No. 2:24-cv-00030-ADA-DTG (W.D. Tex.).

16  
17 I declare under the penalty of perjury that the foregoing is true and correct. Executed at  
18 Portland, Oregon on November 14, 2024.

19  
20 /s/ Amy E. Hayden  
21 Amy E. Hayden  
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